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19 CHICAGO TITLE INSURANCE COMPANY

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21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 UNITED STATES DISTRICT COURT
26 DISTRICT OF NEVADA

27 WELLS FARGO BANK, NATIONAL
28 ASSOCIATION, AS TRUSTEE FOR THE
29 STRUCTURED ADJUSTABLE RATE
30 MORTGAGE LOAN TRUST, MORTGAGE
31 PASS-THROUGH CERTIFICATES
32 SERIES 2005-11,

33 Plaintiff,

34 vs.

35 FIDELITY NATIONAL TITLE GROUP,
36 INC., et al.,

37 Defendants.

Case No.: 2:21-cv-00383-KJD-EJY

~~STIPULATION AND PROPOSED~~
**ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 6] AND MOTION FOR FEES AND
COSTS [ECF No. 7]**

(Fourth Request)



1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Wells Fargo
2 Bank, National Association (“Wells Fargo”) (collectively, the “Parties”), by and through their
3 counsel of record, hereby stipulate and agree as follows:

- 4 1. On March 5, 2021, Wells Fargo filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-830602-C [ECF No. 1-1];
- 6 2. On March 7, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On April. 6, 2021, Wells Fargo filed a Motion for Remand [ECF No. 6] and Motion
9 for Costs and Fees [ECF No. 7];
- 10 4. Chicago Title’s deadline to respond to Wells Fargo’s Motion for Remand and Motion
11 for Costs and Fees was initially April 20, 2021;
- 12 5. On April 21, 2021, the Court granted the Parties’ stipulation extending Chicago Title’s
13 deadline to respond to the Motion for Remand and Motion for Fees and Costs to May
14 20, 2021;
- 15 6. On May 17, 2021, the Court granted the Parties’ stipulation extending Chicago Title’s
16 deadline to respond to the Motion for Remand and Motion for Fees and Costs to June
17 18, 2021;
- 18 7. On June 14, 2021, the Court granted the Parties’ stipulation extending Chicago Title’s
19 deadline to respond to the Motion for Remand and Motion for Fees and Costs to July
20 9, 2021;
- 21 8. Chicago Title’s counsel is requesting an extension until July 23, 2021, to file its
22 response to the pending Motion for Remand and Motion for Costs and Fees;
- 23 9. Chicago Title requests another two-week extension of time to respond to the Motion
24 for Remand and Motion for Costs and Fees to afford Chicago Title additional time to
25 respond to the legal arguments set forth in Wells Fargo’s motions;
- 26 10. Wells Fargo does not oppose the requested extension;
- 27 11. This is the fourth request for an extension which is made in good faith and not for
28 purposes of delay;

1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wells Fargo's
2 Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended
3 through and including July 23, 2021.

4
5 Dated: July 9, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: July 9, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

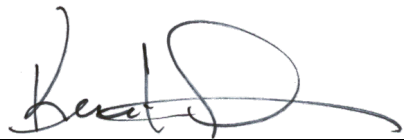
14 Dated: July 9, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Darren T. Brenner
16 DARREN T. BRENNER
17 CHRISTINA V. MILLER
Attorneys for Plaintiff WELLS FARGO
BANK, NATIONAL ASSOCIATION

18
19 **IT IS SO ORDERED:**

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21 Dated: 7/12/2021

22 By: 
23 UNITED STATES DISTRICT COURT JUDGE
24
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26
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